

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION**

DWIGHT McDONALD, CHRISTOPHER)	
ATKINS and TIMOTHY PROVOST,)	
Each Individually and on Behalf)	
of All Others Similarly Situated,)	
)	No. 21-cv-6260
Plaintiffs)	
vs.)	
)	
M2 MANAGEMENT INC.,)	
and MICHAEL P. TRAINOR,)	
)	
Defendants)	

**DEFENDANTS’ UNOPPOSED MOTION FOR EXTENSION OF TIME TO
REPLY TO PLAINTIFF’S RESPONSE IN OPPOSITION TO
DEFENDANTS’ RULE 60(b)(4) MOTION TO VACATE JUDGMENT**

NOW COME Defendants, M2 MANAGEMENT INC. and MICHAEL P. TRAINOR (collectively, “Defendants”), by and through his attorneys, ELLIS LEGAL, P.C., and for his Motion for Extension of Time to Reply to Plaintiffs, DWIGHT McDONALD and TIMOTHY PROVOST’s (collectively, “Plaintiffs”) Response in Opposition to Defendant’s Rule 60(b)(4) Motion to Vacate Judgment, state as follows:

1. On May 28, 2025, Defendants filed their Rule 60(b)(4) Motion to Vacate Judgment. *ECF No. 30.*
2. Plaintiffs’ initial deadline to file a Response in Opposition to the above-referenced Motion was June 11, 2025. Upon an unopposed Motion for Extension of Time that was granted by this Court, Plaintiffs’ deadline extended to June 18, 2025. *ECF Nos. 34 and 35.*
3. Defendants’ deadline to file a Reply in support of their Motion is July 2, 2025.

4. Defendants respectfully request an additional seven (7) days, up to and including July 9, 2025, to file their Reply.

5. This is Defendants' first request for extension of time and is not made for an improper purpose.

6. Defendants' and Plaintiffs' counsel have conferred regarding the requested extension. Plaintiffs do not oppose the Motion for Extension of Time.

WHEREFORE, Defendants respectfully request this Court grant their Motion for Extension of Time to Reply to Plaintiffs' Response in Opposition to Defendants' Rule 60(b)(4) Motion to Vacate Judgment, providing Defendants up to and including July 9, 2024 to file their Reply.

/s/ John C. Ellis
One of Defendants' Attorneys

John C. Ellis
David DeSchepper
Joyce Mendoza Navarro
ELLIS LEGAL, P.C.
200 W. Madison Street, Suite 2670
Chicago, Illinois 60606
jellis@ellislegal.com
ddeschepper@ellislegal.com
jmendozanavarro@ellislegal.com

CERTIFICATE OF SERVICE

I hereby certify that on this day, June 30, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which by its operation will send notification to all counsel of record.

/s/ John C. Ellis